

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re:	§	
	§	Case No. 3:21-bk-02510
RAVEN RENEE SECONDINE	§	
	§	Adversary Proceeding No. 3:21-ap-90160
	§	
	§	Chapter 7
Debtor	§	

ERICA R. JOHNSON, TRUSTEE	§	
Plaintiff	§	
	§	CONTESTED MATTER
v.	§	
CARVANA, LLC and	§	
RAVEN RENEE SECONDINE	§	
Defendant	§	
	§	
	§	

ANSWER

COMES NOW, Carvana, LLC and makes and files it's Answer to Trustee's Complaint to Avoid Security Interest of Carvana, LLC; To Recover Value of Avoided Transfer; And Authority to Sell Property Free and Clear of Lien:

SPECIFIC RESPONSES

1.
Admitted.

2.
Admitted.

3.
Admitted.

4.
Admitted.

5.
Admitted.

6.

Admitted.

7.

Admitted.

8.

Admitted.

9.

Admitted.

10.

Admitted.

11.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 11 and therefore denies same.

12.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 12 and therefore denies same.

13.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 13 and therefore denies same.

14.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 14 and therefore denies same.

15.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 15 and therefore denies same.

16.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 16 and therefore denies same.

17.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 17 and therefore denies same.

18.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 18 and therefore denies same.

19.

Defendant reiterates and incorporates by reference its previous responses.

20.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 20 and therefore denies same.

21.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 21 and therefore denies same.

22.

Defendant is without sufficient information at this time to confirm the veracity of the allegations in paragraph 22 and therefore denies same.

23.

Defendant reiterates and incorporates by reference its previous responses.

24.

Denied.

25.

Denied.

26.

Denied.

27.

Denied.

28.

Defendant reiterates and incorporates by reference its previous responses.

29.

Denied.

30.

Denied.

31.

Defendant reiterates and incorporates by reference its previous responses.

32.

Denied.

33.

Denied.

34.

Denied.

35.

Denied.

This the 14th day of December 2021

Respectfully Submitted

/s/Richard B. Maner

Richard B. Maner, TN Bar 024019

Attorney for Respondent

180 Interstate N Parkway Ste 200

Atlanta, GA 30339

404-252-6385 Phone; 404-252-6394 Fax

rmaner@rbmlegal.com

CERTIFICATE OF SERVICE

This is to certify that I have served a copy of **ANSWER** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Raven Renee Secondine
1636 Cedar Springs Cir
Clarksville, TN 37042

JOHN T. MAHER
THE KENNEDY LAW FIRM, PLLC
127 S. THIRD STREET
CLARKSVILLE, TN 37040

ERICA R. JOHNSON
ERICA R JOHNSON, ATTORNEY AT LAW, PLLC
8161 HIGHWAY 100
SUITE 184
NASHVILLE, TN 37221

U.S. Trustee
US TRUSTEE
OFFICE OF THE UNITED STATES TRUSTEE
701 BROADWAY STE 318
NASHVILLE, TN 37203-3966

This the 14TH day of December 2021

/s/Richard B. Maner
Richard B. Maner, TN Bar 024019
Attorney for Respondent
180 Interstate N Parkway Ste 200
Atlanta, GA 30339
404-252-6385 Phone; 404-252-6394 Fax
rmaner@rbmlegal.com